

1 Morgan Chu (SBN 70446)
2 Benjamin W. Hattenbach (SBN 186455)
3 Amy E. Proctor (SBN 283845)
4 Dominik Slusarczyk (SBN 287084)
5 Charlotte J. Wen (SBN 313572)
6 **IRELL & MANELLA LLP**
7 1800 Avenue of the Stars, Suite 900
8 Los Angeles, California 90067
9 Telephone: (310) 277-1010
10 Facsimile: (310) 203-7199
11 Email: mchu@irell.com
12 Email: bhattenbach@irell.com
13 Email: aproctor@irell.com
14 Email: dslusarczyk@irell.com
15 Email: cwen@irell.com

16 *Counsel for Plaintiff*
17 VLSI TECHNOLOGY LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

19 VLSI TECHNOLOGY LLC,
20 Plaintiff,
21 v.
22 INTEL CORPORATION,
23 Defendant.

Case No. 5:17-cv-05671-BLF (NC)

**[PROPOSED] ORDER GRANTING
VLSI'S MOTION TO COMPEL
DEFENDANT INTEL CORPORATION
TO PROVIDE DISCOVERY ON
ADDITIONAL PRODUCTS**

Judge: Hon. Nathanael M. Cousins

1 At the October 24, 2018 discovery hearing, the Court began to hear from the parties on
 2 Letter Brief 164 (addressing VLSI's preliminary infringement contentions and Intel's production
 3 of technical documents) but argument on the motion was not completed. The Court concluded it
 4 did not have enough time or information to decide this dispute, and suggested that the parties
 5 agree to refer it to a special master. Since that time, the parties jointly agreed to defer this dispute
 6 for resolution by a special master as suggested by the Court, D.I. 176, and jointly requested that
 7 the Court vacate the hearing set for November 14, 2018, *id.* VLSI therefore did not anticipate that
 8 the parties would file additional proposed orders purporting to adjudicate the merits of the motion.
 9 Nonetheless, because Intel chose to submit such a proposed order this evening, out of an excess of
 10 caution VLSI hereby submits a corresponding proposed order granting its motion to compel.

11
 12 Dated: November 7, 2018

Respectfully submitted,

13 By: /s/ Charlotte J. Wen
 14 Charlotte J. Wen

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 22 Los Angeles, California 90067-4276
 Telephone: (310) 277-1010
 Facsimile: (310) 203-7199
 Email: mchu@irell.com
 Email: bhattenbach@irell.com
 Email: aproctor@irell.com
 Email: dslusarczyk@irell.com
 Email: cwen@irell.com

23 *Counsel for Plaintiff*
 24 VLSI TECHNOLOGY LLC